IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS FORT WORTH DIVISION

SHANELLE JENKINS,	§	
as surviving spouse and	§	
Representative of the Estate of	§	
ROBERT GERON MILLER,	§	
Plaintiff,	§	
	§	CIVIL ACTION NO. 4:21-CV-910-O
v.	§	
	§	
TARRANT COUNTY SHERIFF'S	§	
OFFICE, et al.,	§	
Defendants.	§	

TEXAS DEPARTMENT OF PUBLIC SAFETY'S RESPONSE TO PLAINTIFF'S MOTION TO STAY

On November 23, 2021, Plaintiff filed a motion to stay this matter. ¹ The motion specifically excluded the Department of Public Safety and consideration of its pending motion to dismiss. ² The Court subsequently ordered "Defendants" to respond by December 8, 2021. ³

Having been excluded from the relief requested in Plaintiff's motion, the Texas Department of Public Safety takes no position on a desired ruling.

Respectfully submitted,

KEN PAXTON

Attorney General of Texas

BRENT WEBSTER

First Assistant Attorney General

GRANT DORFMAN

Deputy First Assistant Attorney General

SHAWN COWLES

Deputy Attorney General for Civil Litigation

¹ Doc. 22.

² Id. at 10.

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SHANNA E. MOLINARE

Assistant Attorney General Chief, Law Enforcement Defense Division

/s/ Christopher Lee Lindsey

CHRISTOPHER LEE LINDSEY

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ATTORNEYS FOR DPS

NOTICE OF ELECTRONIC FILING

I, **CHRISTOPHER LEE LINDSEY**, Assistant Attorney General of Texas, certify that I have electronically submitted for filing a true and correct copy of the foregoing in accordance with the Electronic Case Files system of the Northern District of Texas, on this the 8th day of December, 2021.

/s/ Christopher Lee Lindsey
CHRISTOPHER LEE LINDSEY
Assistant Attorney General

CERTIFICATE OF SERVICE

I, **CHRISTOPHER LEE LINDSEY**, Assistant Attorney General, do hereby certify that a true and correct copy of the foregoing has been served on all parties by electronic servicing on this 8th day of December, 2021.

/s/ Christopher Lee Lindsey
CHRISTOPHER LEE LINDSEY
Assistant Attorney General